

Privacy notice – Service Users

This privacy notice covers our beneficiaries including but not limited to young people, youth volunteers, youth projects, youth organisations, youth workers, social workers and support workers, and tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

Address

Snow Camp, 306A Portland Road, HOVE, East Sussex, BN3 5LP, GB

Phone Number

01273 241 383

Email

info@snow-camp.org.uk

What information we collect, use, and why

Provide and improve our programmes and services

We may collect or use the following information to **provide and improve our programmes and services**:

- Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation

- Date of birth
- Marital status
- Third party information (such as family members or other relevant parties)
- Payment details (including card or bank information for transfers and direct debits)
- Financial data
- Employment details (including salary, sick pay and length of service)
- Health information (such as medical records or health conditions)
- Criminal records data (including driving or other convictions)
- Information relating to compliments or complaints
- Video recordings
- Records of meetings and decisions
- Account access information

We also may collect or use the following special category information to **provide and improve products and services for clients**. This information is subject to additional protection due to its sensitive nature:

- Health information
- Sexual orientation information

Service updates or marketing purposes

We may collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Website and app user journey information
- Quotes
- Records of consent, where appropriate

Scientific or historical research purposes, for statistical purposes or for archiving in the public interest

We may collect or use the following personal information for **scientific or historical research purposes, for statistical purposes or for archiving in the public interest**:

- Names and contact details
- Addresses
- Purchase or client account history
- Racial or ethnic origin
- Health information



- Sexual orientation information

Please note this information will be anonymised before sharing with funders, etc. unless agreed otherwise.

Comply with legal requirements

We may collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Service user account information
- Health and safety information
- Any other personal information required to comply with legal obligations
- Safeguarding information
- Criminal offence data

Protect service user welfare

We may collect or use the following personal information to **protect service user welfare**:

- Names and contact information
- Client account information
- Health and wellbeing information
- Emergency contact details

We may also collect or use the following special category information to **protect client welfare**.

This information is subject to additional protection due to its sensitive nature:

- Health information

Recruitment purposes

We may collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information



- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We may collect or use the following personal information for **dealing with queries, complaints or claims:**

- Names and contact details
- Service history
- Witness statements and contact details
- Relevant information from previous investigations
- Service user accounts and records
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)



- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We need to collect the information to register young people, apprentices, youth volunteers and youth workers for programme days that take place at various locations in the UK and abroad. This information is required for equipment hire, accommodating dietary requirements, safeguarding and emergencies.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.



- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Our lawful bases for collecting or using personal information to **protect client welfare** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We need to collect dietary requirements, allergies and other relevant health information for anyone attending our programmes to ensure we can provide food, restrict food options (for example when someone with a severe allergy is attending) and respond in case of an emergency.
 - We collect information about additional needs and mental health to be able to provide additional support where required.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Where we get personal information from

- Directly from you
- Publicly available sources
- Third parties:
 - Youth Projects, Youth Organisations, Youth Workers, Support Workers, Social Workers

17 or Under

We are concerned to protect the privacy of children aged 17 or under. If you are aged 17 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information or sending sensitive information to anyone online. On our data management system UpShot we store young people's details, anyone 17 and under must provide parental consent on the system.

To protect young people we will change the name of any young person 17 and under in our marketing materials.

How long we keep information

Our aim is to retain data for no longer than is necessary for the purposes for which the personal data is processed, and the table below shows the retention periods for the employee data that we may hold.

Some personal data is retained for employment purposes, to assist in the running of the business and/or to enable individuals to be paid, in which case we generally follow the 'recommended' retention period. Some personal data is retained for statutory purposes, in which case we follow the 'statutory' retention period.

Record	Retention period
Accident books, accident records, accident reports	Three years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches age 21).
Account history	Six years from last contact.

Accounting records	Six years for public limited companies.
Annual leave (holiday) records on leave and pay	Six years from the date they were made.
Application forms and interview notes (for unsuccessful candidates)	Six months.
Content on laptop and business phone	Fully erased after employment ceases.
DBS, PVG certificates/copies/ information	For duration of employment or involvement with the charity.
Driving licence, vehicle insurance, MOT certificate details	One year after expiry unless renewed.
Email account and associated emails	Deleted after employment ceases.
Expatriate records and other records relating to foreign employees (e.g. visa, work permits, etc.	Six years after employment ceases.
Gift Aid	7 financial years from the date of the last donation
Health information (including dietary requirements, allergies and health conditions)	Deleted for young people and staff once employment/ participation in our programmes ceases. Deleted for event participants after no longer needed to safely run a trip or event.
Income tax and NI returns, income tax records and correspondence with HMRC	Not less than three years after the end of the financial year to which they relate.
Information relating to compliments or complaints	Six years.
Information relating to sponsorship	Six years.
Inland Revenue/HMRC approvals	Permanently.
National minimum wage records	Three years after the end of the pay reference period following the one that the records cover.
Parental leave records	Five years from birth/adoption of the child or 18 years if the child receives a disability living allowance.
Pension scheme investment policies	12 years from the ending of any benefit payable under the policy.
Personnel files and training records (including disciplinary records and working time records)	Six years after employment ceases.
Records of consent	Six years.
Records relating to children and young adults	Until the child/young adult reaches age 21.
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	Six years from the date of redundancy.
References provided by the employer to another employer for previous employee	Six years.
References received for successful candidates who are offered employment	Entirety of employment, plus six years.
References received for unsuccessful candidates prior to being offered employment	Six months.
Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity	Six years from the end of the scheme year in which the event took place.
Right to Work Documents (passport, residence permit, or biometric residence permit, as example Cards	Two years after employment ceases.
Safeguarding & Child Protection Records	10 years from last contact
Senior executives' records (that is, those on a senior management team or their equivalents)	Permanently.
Service Activity Registers	Until the young person turns 25 or 3 years after attending.

SMP, SAP, SSPP records, calculations, certificates (Mat B1s) or other medical evidence, notifications, declarations and notices	Three years after the end of the tax year in which the leave period ends.
Statutory Sick Pay records, calculations, certificates, self-certificates	Six years after the employment ceases.
Supporter Personal Information	6 years from last donor interaction
Transactions and Donations	6 years from last donation
Trustees' minutes	Permanently.
Volunteer Records	6 years after volunteer activity ends.
Wage/salary records (also overtime, bonuses, expenses)	Six years.
WhatsApp messages between team members and within staff WhatsApp staff groups	Disappear automatically after 30 days.
Working time records	Two years from date on which they were made.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

Donorfy (Access UK)

This data processor does the following activities for us: database

Mailchimp

This data processor does the following activities for us: email marketing

UpShot

This data processor does the following activities for us: collect service users and apprentices' data including health, disability, background information and emergency contacts to run the programmes safely

Atlas (Citation)

This data processor does the following activities for us: collect and store all employee HR data including personal details, contracts, disciplinary, annual leave, absences, fit notes, etc.

MS365

This data processor does the following activities for us: email accounts, file storage, calendars, forms, etc.

Quickbooks

This data processor does the following activities for us: invoicing and payment information

HMRC

This data processor does the following activities for us: salary, tax, NI, pensions, gift aid

Sussex Payroll Services (My e Pay Window)

This data processor does the following activities for us: salary, tax, NI, pensions

The Pensions Trust (TPT Retirement Solutions)

This data processor does the following activities for us: pensions

DBS/PVG

This data processor does the following activities for us: DSB/ PVG checks

West & Berry Auditors

This data processor does the following activities for us: audit

Navigatr

This data processor does the following activities for us: digital badges to track training and certificates

HSBC bank

This data processor does the following activities for us: banking

Others we may share personal information with

- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Emergency services
- External auditors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers

Sharing information outside the UK

Where necessary, our data processors will share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Donorfy (Access UK)

Category of recipient: database

Country the personal information is sent to: Ireland

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection for data subjects (also known as Adequacy Regulations or UK data bridge)



Organisation name: Mailchimp

Category of recipient: email marketing

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: compliance to the UK Extension to the EU-U.S. Data Privacy Framework, compliance with the Standard Contractual Clauses (SCCs)

Organisation name: Quickbooks

Category of recipient: invoicing and payment information

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Addendum to EU Standard Contractual Clauses (SCCs)

Organisation name: DBS/PVG

Category of recipient: DBS/PVG checks

Country the personal information is sent to: EEA

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection for data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: HSBC bank

Category of recipient: banking

Country the personal information is sent to: Globally

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us u
via email: info@snow-camp.org.uk

If you remain unhappy with how we've used your data after raising a complaint with us, you can
also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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